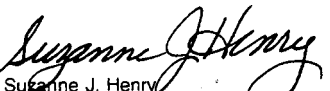


Management Instruction

Asbestos-Containing Building Materials Control Program

This instruction provides policy and guidance for the identification and control of asbestos-containing building materials and establishes the basic requirements for locally implemented asbestos control programs. The revision is made necessary by the restructuring of the Postal Service and is intended to ensure program continuity.

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POLICY

The Postal Service will provide a safe and healthful work environment for all employees and building occupants. Such an environment requires that adequate precautions be taken to prevent employee exposure to airborne asbestos fibers. Effective control of asbestos-containing building materials (ACBMs) not only protects occupants, but also reduces the risk of costs associated with asbestos fiber release episodes, e.g., disruption to operations, employee medical surveillance, and civil fines. Customer Service (CS) district and Processing and Distribution (P&D) plant managers must ensure that this policy is implemented within their functional areas.

Caution: Environmental Protection Agency (EPA) guidance and federal and state regulations are subject to change. Field management must keep current with the latest information and keep programs up to date (see Applicable Guidance and Regulations).

PROGRAM ELEMENTS

Inspection

All postal-owned and -leased buildings must be inspected by inspectors accredited in accordance with the Asbestos Hazard Emergency Response Act (AHERA) or the Asbestos School Hazard Abatement Reauthorization Act (ASHARA) to identify and assess the condition of all ACBMs present. Inspection records must be retained at the facility while ACBMs are present. Previous inspection data may be used, but all ACBMs must be identified for proper management.

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A C R O N Y M S

ACBM – *asbestos-containing building material*

AHERA – *Asbestos Hazard Emergency Response Act*

ASHARA – *Asbestos School Hazard Abatement Reauthorization Act*

EPA – *Environmental Protection Agency*

NESHAP – *National Emission Standards for Hazardous Air Pollutants*

O&M – *operations and maintenance*

OSHA – *Occupational Safety and Health Administration*

PEDC – *postal employee development center*

PELS – *permissible exposure limits*

R&A – *renovation and alteration*

RACM *regulated asbestos-containing material*

TEM – *transmission electron microscope or phase contrast microscope*

ACBMs Management

Facility-specific operations and maintenance (O&M) programs must be established in accordance with EPA Publication 20T-2003, *Managing Asbestos in Place* (see Applicable Guidance and Regulations). These programs and practices ensure that:

1. ACBMs remain undisturbed and in good condition to prevent fiber release (primarily through employee training).
2. ACBMs are monitored frequently for changes in condition.
3. Damaged materials are promptly repaired and previously released fibers are cleaned up.

Abatement

Sprayed-on fireproofing and sound-insulating materials containing asbestos must be removed as soon as possible upon discovery. This removal is necessary because of the high potential for release of asbestos fibers from these materials. Sprayed-on materials encapsulated before issuance of this instruction, however, may be managed in place if in good condition.

Except for these highly friable sprayed-on materials, ACBMs are best managed in place—not removed—unless renovation or demolition necessitates removal under National Emission Standards for Hazardous Air Pollutants (NESHAP). Decisions to remove, repair, etc., other ACBMs (e.g., pipe lagging) must be based on assessments of fiber release potential as described in EPA Publication 560/5-85-024, *Guidance for Controlling Friable Asbestos-Containing Materials in Buildings*. See the section in this instruction on procedures to follow when conducting abatement concurrent with renovation or alteration projects.

New Space

No lease agreements, lease renewals, or building purchases may be initiated for space known to contain sprayed-on surfacing or thermal materials or other ACBMs in poor condition and capable of releasing asbestos fibers. NESHAP Category I and II nonfriable asbestos-containing materials, such as resilient floor coverings and asphalt roofing, are permissible. However, a due diligence report must outline the location of these materials for future O&M management and transfer of the property.

Work Practices

Postal employees must not work with ACBMs if the activity might reasonably be expected to release asbestos fibers. Routine cleaning and maintenance of nonfriable materials, e.g., vinyl asbestos floor tiles and asphalt planking, are permissible following specific established guidelines. All maintenance, repairs and cleanups, alterations, renovations, or removals that may release or reentrain asbestos fibers must be accomplished by qualified asbestos contractors. Accredited inspectors, however, may conduct bulk sampling of suspect ACBMs.

APPLICABLE GUIDANCE AND REGULATIONS

EPA Guidance

The programs established by this instruction are largely predicated on guidance developed by the EPA. In implementing this instruction, local management must base programs on the latest EPA guidance. At this printing, those documents are EPA Publication 20T-2003, *Managing Asbestos in Place*, and EPA Publication 560/5-85-024, *Guidance for Controlling Friable Asbestos-Containing Materials in Buildings*.

Regulations

EPA Regulations

The following EPA regulations are applicable:

1. 40 CFR 61, Subpart M, *The National Emission Standards for Hazardous Air Pollutants* (NESHAP), regulates asbestos emissions from demolition, renovation, and other abatement-related activities. This regulation includes requirements for inspection and EPA notification before commencement of these activities and the presence of accredited persons when ACBMs are removed or disturbed. Categories of friable and nonfriable ACBMs and regulated asbestos-containing materials (RACMs) are defined under this regulation.
2. 40 CFR 763, *Asbestos Hazard Emergency Response Act*, includes Asbestos-Containing Materials in Schools, providing regulations and guidance materials. While this material is not generally applicable to the Postal Service, bulk samples must be analyzed according to AHERA, Appendix A, Subpart F, to comply with the asbestos NESHAP.
3. The Asbestos School Hazard Abatement Reauthorization Act (ASHARA) establishes accreditation requirements for inspectors and abatement contractors working in public and commercial (e.g., postal) buildings. Specific regulations implementing this legislation will be issued by the EPA.

OSHA Regulations

The following Occupational Safety and Health Administration (OSHA) regulations are applicable:

1. 29 CFR 1910.1001, *OSHA Asbestos Standard*, defines employee permissible exposure limits (PELs) and controls for general industry occupational exposure to all forms of asbestos. Employee exposure air monitoring, when necessary, must follow this regulation (see Air Monitoring).
2. 29 CFR 1926.58, *OSHA Construction Standard for Asbestos*, defines employee PELs and work practices for removal or encapsulation of ACBMs; for activities involving construction, alteration, repair, maintenance, or renovation where ACBMs are present; and for demolition of structures where ACBMs are present. The nonmandatory guidelines on asbestos control in appendices to 1926.58 must be followed in postal facilities.

GUIDANCE SOURCES

EPA Regional Offices

*EPA Headquarters TSCA Assistance
Office – (202) 554-1404*

OSHA Offices

*OSHA Headquarters Publications
Office – (202) 523-9667*

*National Technical Information
Service – (703) 487-4650*

3. 29 CFR 1910.1200, *OSHA Hazard Communication Standard*, requires employers to inform employees of the hazards associated with asbestos and how to prevent exposure.

State and Local Laws and Regulations

State and local environmental laws also govern the presence, abatement, and disposal of asbestos. Applicable portions of these environmental laws and regulations must be followed.

PROGRAM RESPONSIBILITIES

Headquarters

Employee Relations

Safety and Health, Employee Relations, coordinates policy on ACBMs in buildings in order to protect employees and building occupants and maintains liaison with OSHA to ensure that policies meet regulations and guidelines. Safety and Health also provides technical assistance through interpretation of OSHA regulations and guidelines and disseminates the latest information regarding changes in regulations and guidelines.

Environmental Management Policy

Environmental Management Policy provides similar assistance pertaining to EPA and state environmental regulations and guidelines.

Facilities, Major Facilities Offices, Facilities Service Offices, and Administrative Support

Facilities and its field counterparts manage abatement, maintenance (that may release or reentrain fibers), and repair of ACBMs in postal buildings through contracted asbestos experts. Facilities also ensures that prelease and prepurchase inspections are conducted for the presence of ACBMs and that ACBMs are not installed in new facilities.

Maintenance Policies and Programs

Maintenance Policies and Programs establishes policies regarding maintenance-related activities to ensure that identified ACBMs are not disturbed. This includes establishment of operations and maintenance (O&M) programs. This effort is to be supported through asbestos awareness training and OSHA training on asbestos.

Training and Development

Postal employee development centers (PEDCs) ensure that accredited inspector training is properly maintained by coordinating accreditation training and certification, as well as refresher training, with the state. Awareness training for employees is administered through PEDCs.

Areas

The area Human Resources manager and area environmental compliance coordinators evaluate field asbestos control programs on a periodic basis and recommend corrective actions to management, as necessary. (The attached checklist may be used.)

Customer Service Districts and Processing and Distribution Plants

Management

CS district and P&D plant managers are responsible for establishing an asbestos control program for their functional area of responsibility. They must designate, as necessary, asbestos program coordinators.

Asbestos Program Coordinators

Coordinators may be domiciled in Maintenance, Safety, or other functional areas depending on the locally available resources, location and amount of ACBMs present, and personal qualifications of the designees. (The Postal Service has many employees previously trained and experienced in ACBM control, and their skills should be availed of when possible.) Program coordinators assign responsibilities and institute procedures to inspect the facilities for the presence of ACBMs” and establish an O&M program in any facility found to contain ACBMs. Coordinators may have responsibility for one or several facilities, depending on the size of the facilities, quantity of ACBMs present, and other factors to be assessed locally.

TRAINING

Professional Training

Coordinators

CS and P&D asbestos program coordinators must have AHERA accreditation as inspector/management planners and receive additional refresher training using EPA-approved AHERA/ASHARA courses.

Inspectors

Personnel assigned to inspect and assess the condition of ACBMs must have AHERA/ASHARA accreditation as inspectors.

Accreditation

Accreditation is accomplished by taking an AHERA Inspector or Inspector/Management Planner Course, passing an exam, and taking refresher courses. Either EPA-approved courses or EPA-approved state accreditation programs and training courses may be used. (States have developed programs and courses that, if they meet or exceed requirements of the model accreditation plan, are EPA approved.) A list of approved courses is published in the *Federal Register* periodically and can be obtained by calling the Toxic Substances Control Act (TSCA) Assistance Office, (202) 554-1404.

Note: Area or other management personnel conducting program evaluations do not require state accreditation, but they should be thoroughly familiar with ACBM control guidance and regulations.

Employee Training

Maintenance Personnel

Maintenance personnel who routinely perform tasks in buildings that may disturb ACBMs (i.e., pulling cable above suspended ceilings, repairing leaking pipes, etc.) must receive an appropriate level of asbestos awareness training and OSHA training that includes topics such as where ACBMs are located in the building, potential adverse health effects of asbestos, the proper use of personal protective equipment, proper cleaning techniques, and other site-specific topics, as necessary (see EPA Publication 20T-2003).

Other Building Occupants

Other employees and tenants must receive a level of ACBM-awareness training appropriate to their risk of exposure. Most employees and other occupants need to know only where ACBMs are located and that they are safe if left undisturbed. The risks of disturbing the material and releasing fibers should be explained. Some persons may need site-specific information to avoid disturbing the ACBMs.

Other Training

Applicable provisions of other OSHA standards may also apply. Employees may need training on respiratory protection and hazard communication.

Administration

Training records must be kept current through the PEDC using established records schedules.

PROCEDURES FOR ABATEMENT AND RENOVATION OR ALTERATION PROJECTS

Supervision

Facilities and its field counterparts have the responsibility for maintenance, repair, removal, renovation, and demolition projects involving ACBMs. All such efforts, as they affect the safety of employees and building occupants, must be coordinated carefully with Human Resources as well as operational functions.

Before implementing asbestos abatement projects, the installation head ensures that all affected building occupants are notified. The installation head retains ultimate responsibility for the safety and health of employees and building occupants.

Abatement Projects

An independent industrial hygiene consultant firm must monitor all abatement projects. Projects must comply with the asbestos NESHAP regulations (for reporting and emission controls), the OSHA standards, and guidance contained in EPA Publication 560/5-85-024. All abatement planners, project managers, contractor supervisors, on-site representatives required by the asbestos NESHAP, and abatement workers must have AHERA accreditation training.

Clearance air sampling for small-scale, short-duration projects may be analyzed by phase contrast microscope or transmission electron microscope (TEM) using the methods and clearance levels described in the document. Larger scale projects must be cleared by TEM using the procedures outlined in the EPA Publication 560/5-85-024 guidance. An alternative method for clearance air monitoring is described in 40 CFR 763 (AHERA), and it can be substituted for the TEM method in EPA Publication 560/5-85-024.

Renovation and Alteration Projects

Before renovation and alteration (R&A) projects are begun, regardless of size, asbestos records must be reviewed and, if necessary, the facility or affected area must be reinspected for the presence of ACBMs. If it is determined that regulated asbestos-containing materials (RACMs), as defined in the asbestos NESHAP, are present, all provisions of 40 CFR 61 must be followed.

AIR MONITORING

Policy

Air monitoring for asbestos fibers has two purposes: to determine potential employee exposures and to assess the condition of ACBMs. The presence of ACBMs does not always require air monitoring, and the need for monitoring is best determined by competent persons. (See Chapter 4 in EPA Publication EPA560/5-85-024) Monitoring must be accomplished by trained, competent persons, e.g., certified industrial hygienists (CIHs), and samples must be analyzed by accredited laboratories.

Regulations

Employee exposure air monitoring is governed by the OSHA regulation. ACBM assessment monitoring should follow strategies and methods outlined in EPA Publication 560/5-85-024 or 40 CFR Part 763 (ASHERA) as determined by competent persons.

General Guidelines

Air monitoring to determine potential employee exposures must be conducted in accordance with 29 CFR 1910.1001 when:

1. ACBMs are disturbed (fiber release episodes).
2. ACBMs are discovered in friable condition.
3. Employees or their representatives request an exposure determination.
4. Abatement projects or repairs are conducted (see Abatement).

Air monitoring to assess the condition of ACBMs should be accomplished when:

1. ACBMs are discovered in poor condition.
2. Competent persons determine that monitoring is necessary to complement the assessment process.

RECORD KEEPING

Local Records

Inspectors must use the initial inspection and evaluation sample forms contained in the two EPA references. The building inspection form is in EPA Publication 560/5-85-024, page I-1. The reinspection and assessment form is in EPA Publication 20T-2003, page 31. Coordinators may also use the other sample forms from the EPA documents for controlling maintenance-related activities.

Data Management

Inspection, air monitoring, and reinspection assessment data required to manage a facility level O&M program should be retained at the local level by the asbestos coordinator. The office responsible for an abatement project (e.g., Facilities Service Office or Administrative Support) maintains the abatement case file. Training records are retained by the PEDC.

Retention

All O&M asbestos program files must be retained at the facility level while ACBMs are present in the facility (an O&M program is ongoing) and forwarded to a Federal Records Center for 30-year retention when the ACBMs are removed. Abatement case files are also forwarded to the Federal Records Center and retained 30 years. Note that asbestos exposure data specific to postal employees, e.g., air monitoring conducted in accordance with the OSHA asbestos standard (see 29 CFR 1910.1001), must be retained in accordance with the standard in the facility safety office and in individual employee medical folders as appropriate.

Attachment

ACBMs Program Implementation Checklist

Use this checklist to initiate and evaluate ACBM programs.

1. CS district or P&D plant asbestos program coordinator appointed.
2. Asbestos program written and coordinated with Human Resources, environmental coordinators, Maintenance.
3. Program evaluations specified.
4. Initial inspection of all buildings for ACBMs planned and executed. Air monitoring accomplished as necessary.
5. Facilities Service Centers and Administrative Support notified when ACBMs abatement required.
6. O&M programs established specific to each building with ACBMs. (See EPA Publication 20T-2003 for details.)
 - a. Occupants notified of presence and location of ACBMs and risks of releasing fibers.
 - b. ACBMs routinely surveyed (e.g., every 6 months) for changes in condition.
 - c. Controls established to prevent disturbance of ACBMs.
 - d. Custodial and maintenance work practices established to prevent ACBMs fiber release.
 - e. Custodians and maintenance workers trained to avoid disturbing ACBMs.
 - f. Emergency fiber release plan established.
 - g. Inspections conducted before renovations to ensure compliance with asbestos NESHAP.
7. Training accomplished.
 - a. Asbestos program coordinator AHERA-accredited as inspector/management planner.
 - b. Inspectors AHERA\ASHARA-accredited and trained on respiratory protection according to the OSHA standard.
8. Records managed.
 - a. EPA forms adapted for facility use.
 - b. Inspection data retained at facility level while ACBMs present and forwarded to Federal Records Center for 30-year retention when ACBMs no longer present.
 - c. Abatement project files retained by responsible office (Administrative Support, Facilities Service Center) and forwarded to Federal Records Center for 30-year retention.
 - d. Employee exposure monitoring data retained at Safety office in accordance with 29 CFR 1910.1001 and forwarded to Federal Records Center for 30-year retention.
 - e. Exposure monitoring specific to an employee placed in employee medical file by district nurse administrator.